

**UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:	)	Bankr. No. 15-24752 CMB
JEWEL J. OUTLAW,	)	
	)	Chapter 13
Debtor.	)	
	)	Docket No. 79
CITIZEN'S BANK,	)	Related to Docket No.
	)	
Movant,	)	Hearing Date & Time:
	)	
vs.	)	Claim No. 16
	)	
JEWEL J. OUTLAW AND	)	
RONDA J. WINNECOUR,	)	
CHAPTER 13 TRUSTEE,	)	
	)	
Respondents.	)	

**DECLARATION OF MORTGAGE PAYMENT CHANGE**

And Now, comes the Debtor, Jewel J. Outlaw , by and through her attorney, who respectfully represents the following:

1. On or about December 31, 2015, Debtor filed for protection under Chapter 13 of the U.S. Bankruptcy Code.
2. This Notice is being filed to notify the Chapter 13 Trustee of the change in mortgage payment amount.
3. Citizen's Bank filed a Notice of Mortgage Payment Change. The monthly mortgage payment of **\$241.56** was **increased** to **\$225.98** effective **3/28/2020**.

WHEREFORE, the Debtor requests that this Honorable Court permit the Chapter 13 Trustee to immediately make the monthly mortgage payment with the next distribution in the effective amount.

Date: 3/25/2020

Respectfully submitted.  
/s/ Rodney D. Shepherd  
Rodney D. Shepherd, Esquire  
Attorney for the Debtor  
PA I.D. No. 56914  
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Suite 208  
Pittsburgh, PA 15203  
(412) 471-9670  
rodsheph@cs.com

**CERTIFICATE OF SERVICE**

I, Rodney D. Shepherd, attorney for the Debtor, hereby certifies that a true and correct copy of the Declaration of Mortgage Payment Change was served on the 25<sup>th</sup> day of March, 2020, by Electronic Filing and U.S. Mail, first class, upon the following:

Ronda J. Winnecour, Esquire  
Chapter 13 Trustee  
cmecf@chapter13trusteewdpa.com

Citizens Bank  
Attn: Jennifer L. Dellatore  
Bankruptcy Department  
One Citizens Bank Way  
Mail Stop JCA115  
Johnston, RI 02919

By: /s/ Rodney D. Shepherd  
Rodney D. Shepherd  
Attorney for the Debtor  
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